

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3/8/2021

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.
BRUSSELS • FRANKFURT • LONDON • PARIS
BEIJING • HONG KONG • TOKYO
MELBOURNE • SYDNEY

March 6, 2021

BY CM/ECF AND EMAIL

Hon. Analisa Torres,
United States District Court,
Southern District of New York,
Daniel Patrick Moynihan U.S. Courthouse,
500 Pearl Street,
New York, NY 10007-1312.

Re: *Contrarian Capital Management LLC, et al. v. Bolivarian Republic of Venezuela,*
19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 18 Civ. 11940 and 19 Civ. 03123)

Dear Judge Torres:

I write on behalf of Defendant the Bolivarian Republic of Venezuela (the “Republic”) in the above-captioned action (the “Action”). On October 1, 2020, this Court entered an order that, among other things, directed Plaintiffs to submit a motion for attorney’s fees by October 30, 2020, and the Republic to oppose any such motion by November 30, 2020. ECF No. 74. On October 30, Plaintiffs filed their Motion for Attorney Fees (“Plaintiffs’ Fee Motion”). ECF Nos. 82-83. In order to allow for settlement discussions, the parties have made five prior extension requests, which the Court granted. ECF Nos. 85-88, 94-95, 97-100. The opposition is now due on Monday, March 8, 2021.

The parties are continuing to engage in active, good faith discussions to attempt to reach a consensual resolution of this matter. The parties have made substantial progress but in order to facilitate discussions they now jointly request a two-stage extension to file the opposition: a one-week extension (to March 15, 2021) and, unless either party files by Friday, March 12, 2021, an objection to the further extension, a one-month extension to April 15, 2021.

We appreciate the Court’s indulgence in this further request, and hope to be able to

Hon. Analisa Torres

-2-

resolve the matter in the time contemplated by this request.

Respectfully submitted,

/s/ Joseph E. Neuhaus

Joseph E. Neuhaus

GRANTED. Defendant's deadline to respond to Plaintiffs' motion for attorneys' fees is extended to **March 15, 2021**. By **March 12, 2021**, the parties shall file their oppositions to a further extension, if any. If no objections are filed, Defendant shall respond to Plaintiffs' motion by **April 15, 2021**.

SO ORDERED.

Dated: March 8, 2021
New York, New York



ANALISA TORRES
United States District Judge